

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, .
ET AL, .
PLAINTIFFS, .
vs. . DOCKET NO. 5:21-CV-844-XR
GREGORY W. ABBOTT, ET AL, .
DEFENDANTS. .

TRANSCRIPT OF STATUS CONFERENCE PROCEEDINGS
BEFORE THE HONORABLE XAVIER RODRIGUEZ
UNITED STATES DISTRICT JUDGE
NOVEMBER 16, 2021

APPEARANCES:
FOR THE PLAINTIFFS: SEAN MORALES DOYLE, ESQUIRE
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1 would be exceedingly difficult for us to be able to confer
2 with private plaintiffs.

3 THE COURT: I see that. You have a different
4 representation to this. So I exclude the U.S. from that
5 discussion.

6 MR. FREEMAN: Thank you, Your Honor.

7 THE COURT: Who else wanted to chime in?

8 MR. COX: Judge, it also implicates the issue that we
9 do have one party, Isabel Longoria, who is both a plaintiff
10 and a defendant in the case, and how we would manage to have a
11 unified omnibus complaint in that respect; I'm not sure.

12 THE COURT: Yeah. So I'm not making any rulings. I
13 can't force you to do that. You-all continue to talk among
14 yourselves and see what's best.

15 Even if you don't do an omnibus complaint, you-all
16 really need to treat this almost as an MDL. You need to have
17 one or two of your group serve as the lead lawyer to speak on
18 behalf of discovery issues and so forth. We've got to make
19 this case more manageable, and an MDL analogy makes most sense
20 to me.

21 MR. MORALES DOYLE: We will absolutely discuss with
22 one another. I want to assure you, Your Honor, that all of
23 plaintiffs' counsel have been in touch with one another. We
24 are not trying to make this more complicated than it needs to
25 be and we will discuss what you proposed.